

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA

Plaintiff,

vs.

TYLER HAROLD CHING,

Defendant.

Case No. 3:23-mj-00551-MMS



AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Special Agent Robert Douglas, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. This affidavit is submitted in support of a criminal complaint against TYLER HAROLD CHING in violation of 18 U.S.C. § 2113(a) and 18 U.S.C. § 2113(g) – Credit Union Robbery and Bank Robbery.

2. I am an “investigative or law enforcement officer of the United States” within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516. I have been a Special Agent with the FBI since May 2018. Since that time, I have been assigned investigative responsibilities in the areas of violent gangs and criminal enterprises investigation in the Anchorage Field Office where I am currently assigned. The Anchorage Field Office is located within the District of Alaska. During this assignment, I have focused



on drug, violent gang, criminal enterprises and felon in possession of a weapon investigations. I have become familiar with the methods commonly used by criminal enterprises and felons in possession of weapons in Alaska. I have been involved in cases involving the investigation and prosecution of defendants for violations of Title 18 of the United States Code. I have been assigned as the Bank Robbery Coordinator during my time with the Anchorage Field Office, and I have assisted with the investigation of numerous bank robberies since October 2018.

3. Prior to my appointment with the FBI, I was employed with the Ontario Police Department (OPD) in Ontario, Oregon, as a Police Officer and Patrol Sergeant. As a Police Officer and Patrol Sergeant, I was assigned to and participated in traffic enforcement and investigations involving drug crimes, crimes against property, and crimes against persons, including homicides. I also led and participated in numerous drug-related arrests and surveillance operations. I also assisted in the preparation and execution of numerous search and arrest warrants.

RELEVANT STATUTES AND REGULATIONS

4. The relevant statutory authority and terms used in this affidavit and its attachments are described and defined below.

- a. 18 U.S.C. § 2113(a), states: “Whoever, by force and violence, or by intimidation, takes, or attempts to take, from the person or presence of another, or obtains or attempts to obtain by extortion any property or money or any other thing of value belonging to, or in the care, custody,

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control, management, or possession of, any bank, credit union, or any savings and loan association;”

- b. 18 U.S.C. § 2113(b), states: "Whoever takes and carries away, with intent to steal or purloin, any property or money or any other thing of value exceeding \$1,000 belonging to, or in the care, custody, control, management, or possession of any bank, credit union, or any savings and loan association, shall be fined under this title or imprisoned not more than ten years, or both;”
- c. 18 U.S.C. § 2113(g), states: "As used in this section the term 'credit union' means any Federal credit union and any State-chartered credit union the accounts of which are insured by the National Credit Union Administration Board, and any 'Federal credit union' as defined in section 2 of the Federal Credit Union Act. The term 'State-chartered credit union' includes a credit union chartered under the laws of a State of the United States, the District of Columbia, or any commonwealth, territory, or possession of the United States".

FACTS ESTABLISHING PROBABLE CAUSE

5. Global Credit Union (GCU) is a “credit union” as defined in 18 U.S.C. § 2113(g), in that it is a state-chartered credit union insured by the National Credit Union Administration Board. GCU operates several branches in Anchorage, Alaska, to provide financial services to its members.

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6. At approximately 2:12 p.m. on September 19, 2023, a male entered the GCU branch located at 12222 Industry Way in Anchorage, Alaska. He was wearing a gray colored beanie style hat with touch controls and a blue square object on the front with the words “Music Hat” written on the side, black sunglasses, a cloth face mask, a dark colored long sleeve shirt/jacket with a zipper on the upper front of garment, dark gray colored pants, black tennis shoes with a white stripe around the bottom and tan soles, and a gray glove with a black colored palm on his left hand. The male suspect was holding what appeared to be a black colored handgun similar in size and shape to a Glock handgun. The suspect was also holding a large dark colored bag with a white draw string.

7. Witness accounts estimated that the male was approximately five feet, four inches to five feet, seven inches, tall. The male suspect had a slim build and described as being of Asian ethnicity and having an Asian or Korean accent. Still photos of the male suspect, taken from surveillance footage at GCU, are depicted below:

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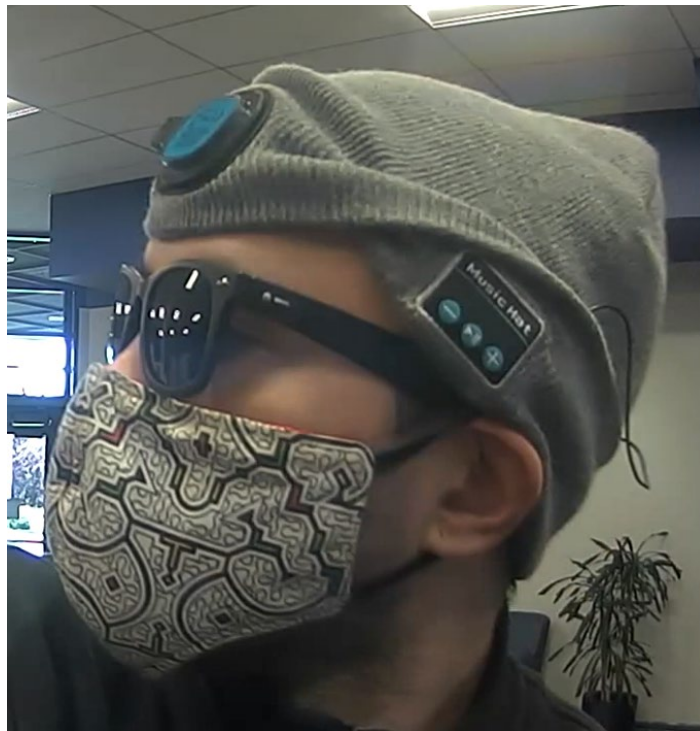
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8. The male suspect ran into the GCU branch with what appeared to be a black handgun pointed at the ground. The male suspect went up to one of the teller windows where two customers were speaking with a GCU employee. The male suspect pointed what appeared to be a handgun at the customers and GCU teller. Witness accounts stated that the suspect pointed the handgun at the GCU teller's face, opened the bag, and placed the bag on the teller counter.

9. Witnesses stated that the male suspect verbally demanded the teller to give him money. Witnesses also stated that the suspect repeatedly demanded more money. The

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- c. 18 U.S.C. § 2113(g), states: "As used in this section the term 'credit union' means any Federal credit union and any State-chartered credit union the accounts of which are insured by the National Credit Union Administration Board, and any 'Federal credit union' as defined in section 2 of the Federal Credit Union Act. The term 'State-chartered credit union' includes a credit union chartered under the laws of a State of the United States, the District of Columbia, or any commonwealth, territory, or possession of the United States".

FACTS ESTABLISHING PROBABLE CAUSE

5. Global Credit Union (GCU) is a “credit union” as defined in 18 U.S.C. § 2113(g), in that it is a state-chartered credit union insured by the National Credit Union Administration Board. GCU operates several branches in Anchorage, Alaska, to provide financial services to its members.

Pratt

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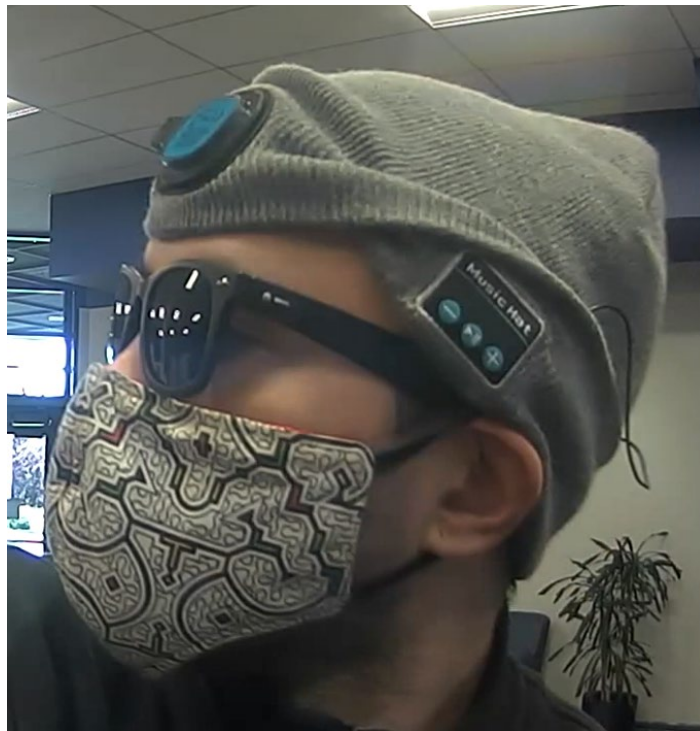
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9. Witnesses stated that the male suspect verbally demanded the teller to give him money. Witnesses also stated that the suspect repeatedly demanded more money. The

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suspect held the bag open and the GCU teller handed approximately \$2,320 in U.S. Currency to the suspect.

10. The suspect closed the money into the bag and ran outside of GCU. Witness accounts stated that the suspect ran around the northeast corner of GCU and out of sight. GCU security cameras captured and recorded the above-described events.

11. The map below depicts the location of the GCU branch and the surrounding businesses:



12. Anchorage Police Department (APD) Officers and Federal Bureau of Investigation (FBI) Special Agents (SA) responded to GCU to investigate. Law enforcement obtained witness statements, reviewed photographs from the GCU

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surveillance video, and searched the surrounding area. Law enforcement was unable to locate the suspect.

13. On September 19, 2023, GCU provided me with video surveillance footage from the robbery. I coordinated with the FBI Anchorage Division Public Affairs Officer (PAO) and sent out a press release to local media requesting information concerning the identity of the suspect.

14. On September 20, 2023, at approximately 1:28 p.m., a male suspect entered the Wells Fargo Bank (WFB) branch located at 6961 Jewel Lake Road in Anchorage Alaska. The suspect was wearing a gray colored beanie style hat with a blue square object on the front, black sunglasses, a cloth face mask, a dark colored long sleeve shirt/jacket with a zipper on the upper front of garment, dark gray colored pants, black tennis shoes with a white stripe around the bottom and tan soles, and a gray glove with a black colored palm on his left hand. The suspect was holding what appeared to be a black colored handgun that was similar in size and shape to a Glock handgun. The suspect was also holding a large dark colored bag with a white draw string.

15. Witness accounts stated that the male suspect was approximately five feet, six inches, to five feet, eight inches, tall, and weighed approximately 145 pounds. Witnesses described the suspect to be of Asian ethnicity with a possibly southeast Asian accent. Still photos of the male suspect are depicted below:

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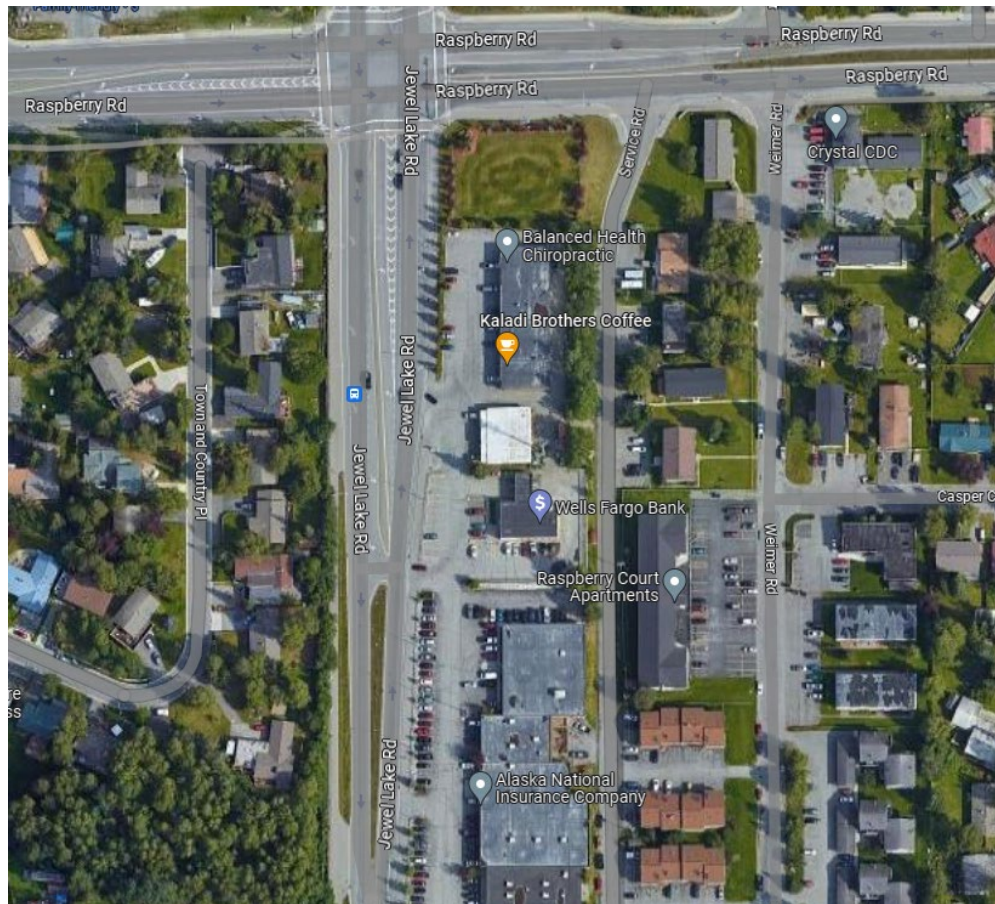
16. Witnesses stated that the male suspect ran into the WFB branch and went up to one of the teller windows where a customer was speaking with a WFB employee teller. The male suspect pointed the black handgun at the customer and at the teller. The teller stated that the suspect pointed the handgun directly at the teller's face and verbally demanded the teller to give him money. Witness accounts also stated that the suspect repeatedly demanded that the money be put into the bag. The WFB teller handed the suspect approximately \$2,820 in U.S. Currency. The suspect placed the money into the bag and fled from WFB on foot. Witness accounts stated that the male suspect was last seen

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running eastbound past the WFB branch drive through. These events were captured and recorded by WFB surveillance cameras.

17. Wells Fargo Bank (WFB) is a bank as defined in 18 U.S.C. § 2113(g) that was, at all times relevant to this case, insured by the Federal Deposit Insurance Corporation (FDIC). WFB operates several branches in Anchorage, Alaska, to provide financial services to its members.

18. The map below depicts the location of the WFB branch and the surrounding businesses:



19. Anchorage Police Department (APD) Officers and Special Agents and Task Force Officers (TFO) of the Federal Bureau of Investigation (FBI) responded to WFB to

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investigate. Multiple WFB employees stated that they had seen the media release of the GCU robbery that occurred the day prior. WFB employees stated that the male who robbed the WFB appeared to be the same suspect depicted in photos from the GCU robbery.

20. On September 20, 2023, the FBI received multiple tips from the public regarding the identity of the suspect from the GCU robbery. One individual stated that the suspect appeared similar to a male on Tinder named Chris, who lived in Big Lake Alaska.

21. An APD dispatcher stated that they recognized the suspect as Tyler Harold Ching. The dispatcher further stated that Ching was a friend-of-a-friend and is familiar with Ching's appearance.

22. A check of the Alaska Public Safety Information Network (APSIN) indicated that Tyler Harold Ching is an Asian male, five feet, five inches, tall, and weighs 143 pounds, which matched the physical description of the suspect. Ching's DMV photograph similarly showed matching characteristics including skin tone, ear lobes, and Adam's apple.

23. On September 21, 2023, at approximately 8:26 a.m., APD Dispatch received a tip from two of Ching's close relatives, referred to herein as Relative 1 and Relative 2. Relative 1 and Relative 2 informed APD Dispatch that they saw the press release about the September 19th GCU robbery and identified the suspect in the photographs as Tyler Harold Ching.

24. Later that day, I interviewed Relative 1, Relative 2, and Relative 2's boyfriend. They stated that they had seen the media release and believed that the suspect

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was Tyler Ching. Relative 1 stated that, as a close family member, he is extremely familiar with Ching's appearance and did not need to see Ching's face to identify him. Relative 2 stated that she was also extremely familiar with Ching's appearance as a close family member and that she recognized Ching's ears, throat, hands and skin color (advising that Ching was half Asian). Relative 1, Relative 2, and Relative 2's boyfriend, all recognized the handgun in photograph as similar to a Glock 19 airsoft gun in Ching's possession.

25. Relative 2 and Relative 2's boyfriend informed me that on Monday, September 18, 2023, they discovered a wrapper for a Glock 19 airsoft handgun in their garage. Relative 2's boyfriend stated that he confronted Ching about not allowing the airsoft gun in his residence and Ching handed the airsoft gun over to him.

26. Relative 1, Relative 2, and Relative 2's boyfriend stated that they argued throughout the day with Ching. Ching stated that he wanted to leave and requested his airsoft gun be returned. Relative 2's boyfriend gave Ching the airsoft gun and Ching left the residence in a silver 2013 Subaru Crosstrek.

27. On September 21, 2023, SA Jolene Goeden and SA Jim Brooks met with Relative 1 at his residence. SA Goeden showed Relative 1 photographs of the suspect in the WFB robbery. Relative 1 stated that the male depicted in the photographs was his close family member, Tyler Ching. Relative 1 further stated that he recognized the shoes worn by the suspect in the photograph as the same shoes belonging to Ching.

28. On September 21, 2023, SA Douglas and SA Katherine Nelson spoke to Relative 2, Relative 2's boyfriend, and Relative 2's adult children, herein referred to as Relative 3 and Relative 4. They were all shown photographs of the suspect from the

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September 20, 2023 WFB robbery and they identified the suspect as Ching. Relative 2 and Relative 2's boyfriend stated that the pants worn by the WFB robbery suspect appeared similar to the pants Ching wore when he left their residence on September 18, 2023.

29. Relative 3 stated that she had been inside of Ching's vehicle multiple times and observed a gray and black colored winter glove appearing similar to the glove worn by the suspect in the robberies. Relative 3 explained that Ching only had one glove and lost the second one. Relative 3 also saw a beanie hat with a light on the front inside of Ching's car, which appeared similar to the hat worn by the suspect during the robberies. Relative 1, Relative 2, Relative 2's boyfriend, Relative 3, and Relative 4 stated that Ching owned a pair of Vans shoes with a thick white line around the bottom, which appeared similar to the shoes the suspect wore during the robberies. The family members were unable to find the pair of shoes inside their residence and believed that Ching had them.

30. Relative 2 told investigators that Ching formerly worked for Kaladi's Brothers Coffee located at 6861 Jewel Lake Rd in Anchorage, which is two buildings north of the WFB branch that was robbed. Relative 2 further stated that Ching is familiar and comfortable in the Jewel Lake area of Anchorage.

CONCLUSION

31. Based upon the information above, your affiant submits that there is probable cause to believe that on or about September 19, 2023, and on or about September 20, 2023, TYLER HAROLD CHING took and carried away, with intent to steal or purloin, money exceeding \$1,000 belonging to, or in the care, custody, control, management, or possession of Global Credit Union located at 12222 Industry Way in Anchorage, Alaska, and Wells

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Fargo Bank located at 6961 Jewel Lake Road in Anchorage, Alaska, in violation of 18 U.S.C. § 2113(a), 18 U.S.C. § 2113(b), and 18 U.S.C. § 2113(g) – Credit Union and Bank Robbery.

Respectfully submitted,



ROBERT DOUGLAS
Special Agent
Federal Bureau of Investigation

Subscribed and sworn pursuant to Fed. R. Crim. P. 4.1 and 41(d)(3) on
Sep 22, 2023



UNITED STATES MAGISTRATE JUDGE